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Sent: Wednesday, November 15, 2023 12:26 PM

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<BDALY@FIDELITYCONSULTINGGROUP.NET>; EXT Karr, Rob <rkarr@irma.org>

Subject: [External] RE: 11/15/2023 - Public Notice - COVID-19 Vaccine Administration Rates

There will need to be an increase in the vaccine administration rate for pharmacies to be compliant with the Pharmacy Practice Act.

- (d) "Practice of pharmacy" means:
- (1) the interpretation and the provision of assistance in the monitoring, evaluation, and implementation of prescription drug orders;
 - (2) the dispensing of prescription drug orders;
 - (3) participation in drug and device selection;
 - (4) drug administration limited to the administration of oral, topical, injectable, and inhalation as follows:
 - (A) in the context of patient education on the proper use or delivery of medications;
 - (B) vaccination of patients 7 years of age and older pursuant to a valid prescription or standing order, by a physician licensed to practice medicine in all its branches, except for vaccinations covered by paragraph (15), upon completion of appropriate training, including how to address contraindications and adverse reactions set forth by rule, with notification to the patient's physician and appropriate record retention, or pursuant to hospital pharmacy and therapeutics committee policies and procedures. Eligible vaccines are those listed on the U.S. Centers for Disease Control and Prevention (CDC) Recommended Immunization Schedule, the CDC's Health Information for International Travel, or the U.S. Food and Drug Administration's Vaccines Licensed and Authorized for Use in the United States. **As applicable to the State's Medicaid program and other payers, vaccines ordered and administered in accordance with this subsection shall be covered and reimbursed at no less than the rate that the vaccine is reimbursed when ordered and administered by a physician;**

There are two fees

1. One for the product (vaccine) being dispensed.
2. Another being the vaccine administration fee – The vaccine administration fee should be \$16.71 same as physicians.

Thanks,
Garth

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